

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HONEYWELL INTERNATIONAL, INC., a
Delaware corporation, INTERMEC, INC., a
Delaware corporation, and INTERMEC
TECHNOLOGIES CORPORATION, a
Washington corporation,

Plaintiffs,

v.

DR. PAUL MALTSEFF,
f/k/a Pavel Maltsev, an individual,

Defendant.

No. 2:14-cv-00283-JLR

**SUPPLEMENTAL DECLARATION OF
PAUL RASKIN IN SUPPORT OF
DEFENDANT'S MOTION TO COMPEL
AND FOR FURTHER RELIEF RE:
DISCOVERY**

I, Paul R. Raskin, hereby declare and state as follows:

1. I am an attorney with Corr Cronin Michelson Baumgardner & Preece LLP, counsel for Defendant Dr. Paul Maltseff in this action. I am competent to testify and submit this Declaration based upon personal knowledge in support of Defendant's Motion to Compel and for Further Relief Re: Discovery.

2. Attached as Exhibit A is a copy of Plaintiffs' complete Answer to Interrogatory No. 8. For ease of reference, the lines that Plaintiffs have designated as Highly Confidential –

SUPPLEMENTAL DECLARATION OF PAUL RASKIN IN
SUPPORT OF DEFENDANT'S MOTION TO COMPEL AND
FOR FURTHER RELIEF RE: DISCOVERY - 1
No. 2:14-cv-00283-JLR

**CORR CRONIN MICHELSON
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1 Attorney's Eyes Only ("AEO") have been circled on the attached copy. A copy of this
2 interrogatory answer with Plaintiffs' AEO designation redacted was previously filed with the
3 Court as part of Exhibit 1 to the Declaration that I previously submitted in connection with the
4 pending motion to compel (Ct. Doc. 86-1).

5 3. Plaintiffs had initially designated their entire answer to Interrogatory No. 8 as AEO.
6 After exchanging email and conferring with Plaintiffs' counsel on August 26, 2014, Plaintiff's
7 counsel narrowed their designation to the lines that are circled on the attached copy. On
8 September 10, 2014, I requested by email that Plaintiffs re-evaluate the remaining confidentiality
9 designation and then conferred with Plaintiffs' counsel Tyler Young regarding this designation on
10 September 11, 2014. Plaintiffs' counsel reiterated their AEO designation and expressed Plaintiffs'
11 position that the designated information should be filed under seal.

12 I declare under penalty of perjury under the laws of the state of Washington and the
13 United States of America that the foregoing is true and correct.

14 DATED this 11th day of September, 2014.

15
16 s/ Paul R. Raskin
17 Paul R. Raskin, WSBA No. 24990
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CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED this 11th day of September, 2014.

s/ Paul R. Raskin

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SUPPLEMENTAL DECLARATION OF PAUL RASKIN IN
SUPPORT OF DEFENDANT'S MOTION TO COMPEL AND
FOR FURTHER RELIEF RE: DISCOVERY - 3

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